

Exhibit C

Karla Perez

June 16, 2018

Page 2

1 ORAL DEPOSITION OF KARLA PEREZ, produced as a
2 witness at the instance of the Plaintiffs and duly
3 sworn, was taken in the above-styled and numbered
4 cause on June 16, 2018, from 11:06 a.m. to 1:55 p.m.,
5 before Mia Cieslar, Certified Shorthand Reporter in
6 and for the State of Texas, reported by computerized
7 machine shorthand, at the offices of the Attorney
8 General, Consumer Protection Division, 808 Travis
9 Street, Suite 1520, Houston, Texas, pursuant to the
10 Federal Rules of Civil Procedure and the provisions
11 stated on the record or attached hereto.

Karla Perez

June 16, 2018
Page 3

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Karla Perez

June 16, 2018

Page 84

1 Q. All right. And just what relation are they
2 to you?

3 A. Extended family only.

4 Q. Okay. Since you came here in 1995, have you
5 left the United States?

6 A. No.

7 Q. Been here ever since?

8 A. Yes.

9 Q. All right. Have you ever applied for advance
10 parole?

11 A. Yes.

12 Q. When did you apply for advance parole?

13 A. Early -- late -- late 2016, early 2017. It
14 was over my school winter break.

15 Q. Okay. Did you get advance parole?

16 A. I was -- my application for advance parole
17 was approved in early March.

18 Q. Of?

19 A. Of 2017.

20 Q. Okay. And then why did you apply for advance
21 parole?

22 A. My maternal grandmother has gotten very sick
23 over the years, and I thought that I could have the
24 opportunity to see her during that time. Yeah.

25 Q. And is she in Mexico?

Karla Perez

June 16, 2018

Page 85

1 A. Yes.

2 Q. All right. Did you go see her?

3 A. No.

4 Q. Right. Because you haven't left since '95,
5 obviously. And why --

6 A. Yes.

7 Q. -- why did you not go?

8 A. I applied for advance parole, as I mentioned,
9 later in 2016 or earlier in 2017, and I didn't hear
10 back until March. And when I received the approval,
11 my schedule just didn't allow it at that time.

12 Q. Okay. Will you just describe to me the
13 process of applying for advance parole.

14 A. Yes. There's a -- an application for advance
15 parole. That's a USCIS application. I completed the
16 application. I had to provide documentation for why I
17 was requesting advance parole. That was based on the
18 humanitarian reason of my sick grandmother. So I
19 provided those documents showing that in my
20 application packet to USCIS, along with a sworn
21 declaration about why I was seeking advance parole.

22 Q. All right.

23 A. And I paid a filing fee as well.

24 Q. Okay. So you submit the material and pay the
25 filing fee. Did you have to do anything else?

Karla Perez

June 16, 2018

Page 103

1 __X__ was requested by the deponent or a party
2 before the completion of the deposition and returned
3 within 30 days from date of receipt of the transcript.
4 If returned, the attached Changes and Signature Page
5 contains any changes and the reasons therefor;

6 _____ was not requested by the deponent or a
7 party before the completion of the deposition.

8 I further certify that I am neither attorney
9 nor counsel for, related to, nor employed by any of
10 the parties in the action in which this testimony was
11 taken.

12 Further, I am not a relative or employee of
13 any attorney of record in this cause, nor do I have a
14 financial interest in the action.

15 Subscribed and sworn to on this the _____ day
16 of _____, 20____.

17
18
19
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